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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 10-0860 (WHA)
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME PURSUANT
v.)	TO 18 U.S.C. § 3161
)	
ANNABEL McCLELLAN,)	
)	
)	
Defendant.)	

WHEREAS, the Magistrate Court conducted a hearing on November 30, 2010;

WHEREAS, on November 30, 2010, the government produced approximately 2,052 documents to counsel for the defendant; and defendant's counsel believes that additional time is necessary to review the evidence and investigate the case, and believes it is in the best interests of the defendant to do so as soon as possible;

WHEREAS, a failure to grant the continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and under the circumstances the ends of justice served by a reasonable continuance outweigh the best interest of the public and the defendant in a speedy trial;

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME PURSUANT TO 18 U.S.C. § 3161,
United States v. McClellan, Case No. CR 10-0860 (WHA)

1 WHEREAS, the defendant consents to a continuation of this case for the above reasons
2 and consents to the exclusion of time from November 30, 2010 until December 14, 2010;

3 THEREFORE, it is hereby stipulated by and between the parties, through their respective
4 counsel of record, that the period of time from November 30, 2010 until December 14, 2010,
5 shall be excluded in computing the time within which the trial of the offense alleged in the
6 Indictment must commence under Title 18, United States Code, Section 3161.

7 IT IS SO STIPULATED.

8 DATED: December 9, 2010

MELINDA HAAG
United States Attorney
Northern District of California

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11 /S/
Adam A. Reeves
Assistant United States Attorney

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13 DATED: December 9, 2010

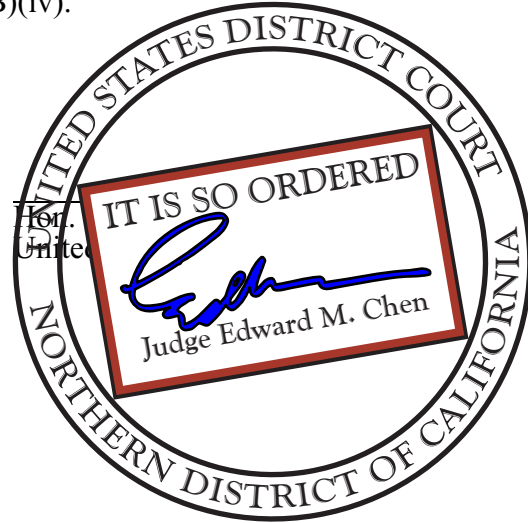
/S/
Nanci L. Clarence, Esq.
Clarence & Dyer, LLP
Counsel for Annabel McClellan

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28 STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME PURSUANT TO 18 U.S.C. § 3161,
United States v. McClellan, Case No. CR 10-0860 (WHA)

1 The Court finds that the ends of justice served by granting a continuance from November
2 30, 2010 until December 14, 2010 outweigh the best interests of the public and the defendant in a
3 speedy trial and in the prompt disposition of criminal cases. The Court therefore concludes that
4 this exclusion of time from November 30, 2010 until December 14, 2010 should be made under
5 Title 18, United States Code, Sections 3161(h)(7)(B)(iv).

6 **IT IS SO ORDERED.**

7
8 DATED: 12/14, 2010



28 STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME PURSUANT TO 18 U.S.C. § 3161,
United States v. McClellan, Case No. CR 10-0860 (WHA)